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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	Case No. CR-13-408-JST
)	
14 Plaintiff,)	
)	
15 v.)	STIPULATION TO CONTINUE MOTIONS
)	HEARING AND PROPOSED ORDER
16 MUZAFFAR HUSSAIN,)	THEREON
)	
17 Defendant.)	
)	
18)	
19)	

20 **IT IS HEREBY STIPULATED** by and between the parties that the motions hearing in
21 this matter, currently scheduled for April 13, 2015 at 2:00 p.m., be continued to April 20, 2015
22 at 2:00 p.m. in Oakland.

23 The reason for this stipulation is as follows:

24 Over the weekend, an illness defense counsel contracted during last week became more
25 acute resulting in defense counsel losing consciousness on Sunday afternoon. That evening,
26 recognizing that he would be unfit to conduct the motions hearing on Monday, April 13, 2015,
27

1 defense counsel contacted his associate, Jason T. Campbell, Esq. and asked him to cover the
2 hearing. Mr. Campbell has worked on this case and is familiar with the facts and law related to
3 the pending motions.
4

5 On Monday morning, defense counsel went to the doctor. The doctor prescribed some
6 medication to counsel and ordered blood work. While he was at the doctor's office, defense
7 counsel received a call from the defendant, Mr. Muzaffar Hussain. Mr. Hussain informed defense
8 counsel that he was at the hospital and believed to be experiencing problems with his kidneys
9 and/or heart. Defense counsel is informed and believes that Mr. Hussain has been admitted to
10 the Valley Center Hospital in Pleasanton, CA for observation but is unaware of his condition at
11 this time.
12

13 Upon learning of Mr. Hussain's condition, defense counsel contacted Mr. Campbell who,
14 in turn, contacted Assistant United States Attorney Cynthia Stier. Ms. Stier informed the
15 courtroom clerk of these developments via e-mail. The Court's clerk, Mr. William Noble,
16 responded to Ms. Stier's e-mail indicating that the Court was aware of the situation and, based
17 on counsel's representations, would agree to continue the motions hearing until Monday, April
18 20, 2015 at 2:00 p.m.—a date amenable to both parties.
19

20 **IT IS SO STIPULATED.**
21

22 MELINDA HAAG, ESQ.
23 United States Attorney

24 Dated: April 13, 2015

25 By: /s/Cynthia L. Stier
26 CYNTHIA L. STIER, ESQ.
27 Assistant United States Attorney
28 Attorney for Plaintiff

1 Dated: April 13, 2015

By: /s/David J. Cohen

DAVID J. COHEN, ESQ.

Attorneys for Defendant **Hussain**

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3 **IT IS SO ORDERED.**

4
5
6 Dated: April 13, 2015

